Henry Waring
Cooper Tire and Rubber Company
207 South West Street
Auburn, IN 46706

Dear Henry Waring:

Re: Exempt Construction and Operation Status,
033-12524-00013

The application from Cooper Tire and Rubber Company, received on July 21, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following dip style coating line, to be located at 207 South West Street Auburn, IN 46706, is classified as exempt from air pollution permit requirements:

One (1) dip style coating line # 2, with a maximum capacity of 960 units per hour and a natural gas fired oven with maximum capacity of 0.14 million BTU/hour, exhausting to stacks number 128 and 127 respectively.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source has submitted their Part 70 application (T 033-6253-00013) on July 9, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS

cc: File – DeKalb County
DeKalb County Health Department
Air Compliance – Doyle Houser
Northern Regional Office
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
Part 70 Application File - T-033-6253-00013

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: **Cooper Tire and Rubber Company**
Source Location: **207 South West Street, Auburn, Indiana 46706**
County: **DeKalb**
SIC Code: **3061**
Operation Permit No.: **033-12524-00013**
Permit Reviewer: **Gurinder Saini**

The Office of Air Management (OAM) has reviewed an application from Cooper Tire and Rubber Company relating to the construction and operation of dip style coating line.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

One (1) dip style coating line # 2, with a maximum capacity of 960 unit per hour and a natural gas fired oven with maximum capacity of 0.14 million BTU/hour, exhausting to stacks number 128 and 127 respectively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Construction and Operation Permit 033-10248-00013 issued on January 28, 1999.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
127	Dip Line - Oven	34	0.6	300	200
128	Dip Line Coating Booth-	34	0.6	Ambient	1000

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the *construction and operation* be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on July 21, 2000.

Emission Calculations

See Appendix A pages 1 to 3 this document for detailed emissions calculations.

Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.@

Pollutant	Emissions (ton/yr)
PM	251.3
PM10	278.3
SO_2	0
VOC	638.1
CO	0.2
NO_x	0.4

These emissions were based on TSD for Construction and Operation permit number 033-10248-00013 issued on January 28, 1999

Potential To Emit of the Modification

Pollutant	**Potential To Emit (tons/year)**
PM	**0**
PM-10	**0**
SO_2	**0**
VOC	**4.24**
CO	**0.1**
NO_x	**0.1**

The Coating material contains Glycol Ether, which is a hazardous air pollutant. As Glycol Ether is also a VOC, therefore maximum HAP/HAPs potential to emit is same as for VOC.

HAPs	Potential To Emit (tons/year)
Glycol Ether	4.24
TOTAL	4.24

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 10 tons per year. The Title V permit for the source has not been issued. Therefore, the modification will be issued an exemption.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Therefore an Exemption will be issued to this application.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) DeKalb County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	251.3
PM10	278.3
SO_2	0
VOC	638.1
CO	0.2
NO_x	0.4

(a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

(b) These emissions were based on TSD for Construction and Operation permit number 033-10248-00013 issued on January 28, 1999

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-033-6253-00013) application on July 9, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM_{10} and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants)

This rule does not apply because the potential emission of single HAP and combination of HAPs is less than 10 and 25 tons per year respectively.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This rule does not apply to the Dip Line #2. Although the coating operations apply coating to metal inserts, the source does not belong to the categories listed in part (a) of this rule under applicability.

326 IAC 8-1-6 (General Provision relating to VOC rules)

This rule does not apply because the potential to emit VOC is less than 25 tons per year.

Conclusion

The construction and operation of this dip style coating line shall be subject to the conditions of the attached proposed Exemption 033-12524-00013.

Appendix A: Emission Calculations
Summary of PTE

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street, Auburn IN 46706
CP#: 033-12524
Plt ID: 033-00013
Reviewer: Gurinder Saini
Date: August 2, 2000

Potential to Emit (Tons/Year)

Activity Type	PM	PM-10	SO2	VOC	CO	NOx	HAP	HAPS
Surface Coating	0	0	0	4.24	0	0	4.24	4.24
Gas Oven	0	0	0	0	0.1	0.1	0	0
Total	**0**	**0**	**0**	**4.24**	**0.1**	**0.1**	**4.24**	**4.24**

From page 2 and 3 of the Appendix A

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street, Auburn IN 46706
CP: 033-12524
Plt ID: 033-00013
Reviewer: Gurinder Saini
Date: August 2, 2000

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
7640	11.2	46.20%	44.4%	1.8%	59.9%	37.60%	0.00500	960.000	0.50	0.20	0.97	23.22	4.24	0.00	0.54	100%

State Potential Emissions **Add worst case coating to all solvents** **0.97** **23.22** **4.24** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Gas Oven for Dip Line # 2

Company Name: Cooper Tire and Rubber Company
Address City IN Zip: 207 South West Street, Auburn IN 46706
CP: 033-12524
Plt ID: 033-00013
Reviewer: Gurinder Saini
Date: August 2, 2000

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.1	1.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0	0.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.288E-06	7.358E-07	4.599E-05	1.104E-03	2.085E-06

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.066E-07	6.745E-07	8.585E-07	2.330E-07	1.288E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.